



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 17, 2020

APPLICATION GRANTED
SO ORDERED *Vern Broderick*

VERNON S. BRODERICK
U.S.D.J. 8/18/2020

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

The status conference scheduled for August 24, 2020 is hereby adjourned to October 29, 2020 at 10:00 a.m. The adjournment is necessary to allow the parties to discuss a pretrial disposition of this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between August 18, 2020 and October 29, 2020 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice.

Re: *United States v. Rafael Valdovinos*, 19 Cr. 671 (VSB)

Dear Judge Broderick:

The parties respectfully write to request a 60-day adjournment of the status conference currently scheduled for August 24, 2020. The defendant has requested to meet with the Government in an effort to qualify for safety valve relief, pursuant to 18 U.S.C. § 3553(f). However, because of COVID-19-related limitations, the parties have been unable to arrange an in-person proffer. Accordingly, the parties request a sixty-day adjournment of the status conference currently scheduled for August 24, 2020 at 10:30 a.m. The Government also respectfully requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between August 24, 2020 and the date of the next status conference. The defendant, through his attorney Jeffrey Chartier, Esq., has no objection to the exclusion of time.

Very truly yours,

AUDREY STRAUSS
Acting United States Attorney

by: *Nicholas W. Chiuchiolo*

Nicholas W. Chiuchiolo
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Assistant United States Attorney
(212) 637-1247 / 2493

cc: Jeffrey Chartier, Esq. (by ECF)